

**EXHIBIT 21**

1 William A. Isaacson  
2 BOIES, SCHILLER & FLEXNER LLP  
3 5301 Wisconsin Ave. NW, Suite 800  
Washington, D.C. 20015  
Telephone: (202) 237-2727  
Facsimile: (202) 237-6131

4 Philip J. Iovieno  
5 Anne M. Nardacci  
6 BOIES, SCHILLER & FLEXNER LLP  
30 South Pearl Street, 11th Floor  
Albany, NY 12207  
7 Telephone: (518) 434-0600  
Facsimile: (518) 434-0665  
8 Email: piovieno@bsfllp.com  
anardacci@bsfllp.com

9  
10 *Liaison Counsel for Direct Action Plaintiffs and  
Attorneys for Plaintiffs Electrograph Systems, Inc.,  
Electrograph Technologies, Corp., Office Depot, Inc.,  
CompuCom Systems, Inc., Interbond Corporation of  
America, P.C. Richard & Son Long Island  
Corporation, MARTA Cooperative of America, Inc.,  
ABC Appliance, Inc., Schultze Agency Services LLC  
on behalf of Tweeter Opco, LLC and Tweeter Newco,  
LLC, Tech Data Corporation and Tech Data Product  
Management, Inc.*

11  
12 [additional counsel listed on signature page]

13  
14  
15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18  
19 IN RE: CATHODE RAY TUBE (CRT)  
20 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC  
MDL No. 1917

21 This document relates to:

**DIRECT ACTION PLAINTIFFS' SECOND  
SET OF INTERROGATORIES TO THE  
THOMSON DEFENDANTS**

22 *Electrograph Systems, Inc., et al. v. Hitachi,  
Ltd., et al.*, No. 11-cv-01656;

23 *Siegel v. Hitachi, Ltd., et al.* No. 11-cv-  
05502;

24 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et  
al.*, No. 11-cv-05513;

25 *Target Corp, et al. v. Chunghwa Picture  
Tubes, Ltd., et al.*, No. 11-cv-05514;

1           *Interbond Corporation of America v.*  
 2           *Hitachi, et al.*, No. 11-cv-06275;  
 3           *Office Depot, Inc. v. Hitachi Ltd., et al.*,  
 4           No. 11-cv-06276;  
 5           *CompuCom Systems, Inc. v. Hitachi, Ltd.,*  
 6           *et al.*, No. 11-cv-06396;  
 7           *Costco Wholesale Corporation v. Hitachi,*  
 8           *Ltd., et al.*, No. 11-cv-06397;  
 9           *P.C. Richard & Son Long Island*  
 10          *Corporation, et al. v. Hitachi, Ltd., et al.*,  
 11          No. 12-cv-02648;  
 12          *Schultze Agency Services, LLC, et al. v.*  
 13          *Hitachi, Ltd., et al.*, No. 12-cv-02649;  
 14          *Tech Data Corporation, et al. v. Hitachi,*  
 15          *Ltd., et al.*, No. 13-cv-00157;  
 16          *Sharp Electronics Corp., et al. v. Hitachi,*  
 17          *Ltd., et al.*, No. 13-cv-01173;  
 18          *Sharp Electronics Corp. et al. v. Koninklijke*  
 19          *Philips Electronics, N.V., et al.*, No. 13-cv-  
 20          02776;  
 21          *Siegel v. Technicolor SA, et al.*, No. 13-cv-  
 22          05261;  
 23          *Sears, Roebuck & Co., et al. v. Technicolor*  
 24          *SA, et al.*, No. 13-cv-05262;  
 25          *Best Buy Co., Inc., et al. v Technicolor SA,*  
 26          *et al.*, No. 13-cv-05264;  
 27          *Schultze Agency Services, LLC v.*  
 28          *Technicolor SA, et al.*, No. 13-cv-05668;  
 29          *Target Corp., v. Technicolor SA, et al.*,  
 30          No. 13-cv-05686;  
 31          *Costco Wholesale Corporation v.*  
 32          *Technicolor SA, et al.*, No. 13-cv-05723;  
 33          *Electrograph Systems, Inc., et al. v.*  
 34          *Technicolor SA, et al.*, No. 13-cv-05724;  
 35          *P.C. Richard & Son Long Island*  
 36          *Corporation, et al. v. Technicolor SA, et al.*

1 No. 13-cv-05725;  
2 *Office Depot, Inc., v. Technicolor SA, et al.*,  
3 No. 13-cv-05726;  
4 *Interbond Corporation of America v.*  
Technicolor SA, et al., No. 13-cv-05727

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1           **PROPOUNDING PARTIES:**

2           Direct Action Plaintiffs Electrograph Systems, Inc. and  
3           Electrograph Technologies Corp.; Alfred H. Siegel, solely  
4           as Trustee of the Circuit City Stores, Inc. Liquidating  
5           Trust; Best Buy Co., Inc., Best Buy Purchasing LLC, Best  
6           Buy Enterprise Services, Inc., Best Buy Stores, L.P.,  
7           Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.; Target  
8           Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond  
9           Corporation of America; Office Depot, Inc.; CompuCom  
10          Systems, Inc.; Costco Wholesale Corporation; P.C.  
11          Richard & Son Long Island Corporation, MARTA  
12          Cooperative of America, Inc., and ABC Appliance, Inc.;  
13          Schultze Agency Services, LLC on behalf of Tweeter  
14          Opco, LLC and Tweeter Newco, LLC; Tech Data  
15          Corporation and Tech Data Product Management, Inc.;  
16          and Sharp Electronics Corporation and Sharp Electronics  
17          Manufacturing Company of America, Inc.

18           **RESPONDING PARTIES:**

19           Thomson SA and Thomson Consumer Electronics, Inc.

20           **SET:**

21           Two

1 PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 33 of the Federal Rules of  
2 Civil Procedure, the undersigned Direct Action Plaintiffs, through counsel, request that the  
3 Thomson Defendants (as defined herein) respond in writing, subscribed under oath, to the  
4 following interrogatories within 30 days of the date of service of this request.

5 **DEFINITIONS**

6 The words and phrases used in these interrogatories shall have the meanings ascribed to  
7 them under the Federal Rules of Civil Procedure and the Local Rules of the United States District  
8 Court for the Northern District of California. In addition, the following terms shall have the  
9 meanings set forth below whenever used in any interrogatory.

10 1. The words "all," "any," and "each" mean "each and every."

11 2. The words "and" and "or" are both conjunctive and disjunctive as necessary.

12 3. The term "relevant period" means the period beginning March 1, 1995 through  
December 31, 2007.

14 4. The term "Thomson Defendants" refers collectively to Thomson SA and  
Thomson Consumer Electronics, Inc.

16 5. The terms "you" and "your" mean the Thomson Defendants and/or each of the  
Thomson Defendants, as defined herein.

18 **INSTRUCTIONS**

19 1. Pursuant to Federal Rule of Civil Procedure 33, you are required to answer the  
20 following interrogatories under oath within 30 days or within the time otherwise required by  
21 Court order.

22 2. You must serve a written response to the interrogatories, and such response must  
23 be signed. In answering the interrogatories, furnish all information available to you, including  
24 information in the possession of your attorneys and all persons acting on your behalf.

25 3. If you assert a claim of attorney-client privilege or attorney work product with  
26 respect to any of the interrogatories contained herein:

- a. state the factual basis of the purported privilege or claim of work product in sufficient detail so as to permit the Court to adjudicate the validity of the claim; and

b. state the numbered interrogatory to which the privileged information is responsive.

5           4. If you object to any portion of any interrogatory, provide all information requested  
6 by any portion of the interrogatory to which you do not object.

7        5. Each interrogatory requires full and accurate disclosure based on all available  
8 information and all documents within your possession, custody, or control.

9       6. Whenever a date, amount, computation, or figure is requested, the exact date,  
10 amount, computation, or figure is to be given unless it is unknown. If it is unknown, the  
11 approximate or best estimate should be given and the answer should state that the date, amount,  
12 computation, or figure provided is an approximation.

13       7. These interrogatories are continuing in nature to the extent provided in Rule 26(e)  
14 of the Federal Rules of Civil Procedure, and to the extent that you, or your attorneys, agents or  
15 representatives become aware of additional information responsive to this request subsequent to  
16 their initial response, you are required to immediately provide such information requested herein.

## **INTERROGATORIES**

**INTERROGATORY NO. 1:**

If your response to any request for admission in Direct Action Plaintiffs' First Set of Requests for Admission to Thomson Defendants served with these Interrogatories is not an unqualified admission:

- (a) State the number of the request;
- (b) State all facts upon which you based your response;
- (c) Identify each person who has knowledge of those facts; and
- (d) Identify all documents that support your response

**INTERROGATORY NO. 2:**

Describe your ownership of the RCA brand name from the beginning of the relevant period through the present.

1      **INTERROGATORY NO. 3:**

2              Describe your use of the RCA brand name with respect to finished products sold by you in  
3              the United States from the beginning of the relevant period through the present.

4      **INTERROGATORY NO. 4:**

5              Describe your ownership of the Proscan brand name from the beginning of the relevant  
6              period through the present.

7      **INTERROGATORY NO. 5:**

8              Describe your use of the Proscan brand name with respect to finished products sold by  
9              you in the United States from the beginning of the relevant period through the present.

10     DATED: June 27, 2014

11     /s/ Philip J. Iovieno

12              Philip J. Iovieno  
13              Anne M. Nardacci  
14              BOIES, SCHILLER & FLEXNER LLP  
15              30 South Pearl Street, 11th Floor  
16              Albany, NY 12207  
17              Telephone: (518) 434-0600  
18              Facsimile: (518) 434-0665  
19              Email: piovieno@bsflp.com  
20              anardacci@bsflp.com

21              William A. Isaacson  
22              BOIES, SCHILLER & FLEXNER LLP  
23              5301 Wisconsin Ave. NW, Suite 800  
24              Washington, D.C. 20015  
25              Telephone: (202) 237-2727  
26              Facsimile: (202) 237-6131  
27              Email: wisaacson@bsflp.com

28              Stuart Singer  
29              BOIES, SCHILLER & FLEXNER LLP  
30              401 East Las Olas Blvd., Suite 1200  
31              Fort Lauderdale, FL 33301  
32              Telephone: (954) 356-0011  
33              Facsimile: (954) 356-0022  
34              Email: ssinger@bsflp.com

35              *Liaison Counsel for Direct Action Plaintiffs and  
36              Attorneys for Plaintiffs Electrograph Systems, Inc.,  
37              Electrograph Technologies, Corp., Office Depot, Inc.,  
38              CompuCom Systems, Inc., Interbond Corporation of  
39              America, P.C. Richard & Son Long Island*

*Corporation, MARTA Cooperative of America, Inc., ABC Appliance, Inc., Schultze Agency Services LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC and Tech Data Corporation and Tech Data Product Management, Inc.*

s/ Scott N. Wagner

Robert W. Turken  
Scott N. Wagner  
Mitchell E. Widom  
BILZIN SUMBERG MAENA PRICE & AXELROD  
LLP  
1450 Brickell Ave, Suite 2300  
Miami, FL 33131-3456  
Tel: 305-374-7580  
Fax: 305-374-7593  
Email: [rturken@bilzin.com](mailto:rturken@bilzin.com)  
[swagner@bilzin.com](mailto:swagner@bilzin.com)  
[mwidom@bilzin.com](mailto:mwidom@bilzin.com)

*Counsel for Plaintiffs Tech Data Corporation and  
Tech Data Product Management, Inc.*

/s/ Cori G. Moore

David J. Burman (pro hac vice)  
Cori G. Moore (pro hac vice)  
Eric J. Weiss (pro hac vice)  
Nicholas H. Hesterberg (pro hac vice)  
Steven D. Merriman (pro hac vice)  
Perkins Coie LLP  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: (206)359-8000  
Facsimile: (206)359-9000  
Email: DBurman@perkinscoie.com  
CGMoore@perkinsncoie.com  
EWeiss@perkinscoie.com  
NHesterberg@perkinscoie.com  
SMerriman@perkinscoie.com

Joren Bass, Bar No. 208143  
Perkins Coie LLP  
Four Embarcadero Center, Suite 2400  
San Francisco, CA 94111-4131  
Telephone: (415)344-7120  
Facsimile: (415)344-7320  
Email: JBass@perkinscoie.com

*Counsel for Plaintiff Costco Wholesale Corporation*

/s/ *David Martinez*

Roman M. Silberfeld  
David Martinez  
Jill S. Casselman  
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.  
2049 Century Park East, Suite 3400  
Los Angeles, CA 90067-3208  
Telephone: (310) 552-0130  
Facsimile: (310) 229-5800  
Email: [rmsilberfeld@rkmc.com](mailto:rmsilberfeld@rkmc.com)  
[dmartinez@rkmc.com](mailto:dmartinez@rkmc.com)  
[jscasselman@rkmc.com](mailto:jscasselman@rkmc.com)

Elliot S. Kaplan  
K. Craig Wildfang  
Laura E. Nelson  
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.  
800 LaSalle Avenue  
2800 LaSalle Plaza  
Minneapolis, MN 55402  
Telephone: (612) 349-8500  
Facsimile: (612) 339-4181  
Email: [eskaplan@rkmc.com](mailto:eskaplan@rkmc.com)  
[kcwildfang@rkmc.com](mailto:kcwildfang@rkmc.com)  
[lenelson@rkmc.com](mailto:lenelson@rkmc.com)

*Counsel For Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.*

/s/ William J. Blechman

Richard Alan Arnold  
William J. Blechman  
Kevin J. Murray  
KENNY NACHWALTER, P.A.  
201 S. Biscayne Blvd., Suite 1100  
Miami, FL 33131  
Tel: 305-373-1000  
Fax: 305-372-1861  
Email: rarnold@knpa.com  
wblechman@knpa.com  
kmurray@knpa.com

*Counsel for Plaintiff Sears, Roebuck and Co. and Kmart Corp.*

1                   /s/ Kenneth S. Marks  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

H. Lee Godfrey  
Kenneth S. Marks  
Jonathan J. Ross  
Johnny W. Carter  
David M. Peterson  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, Texas 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666  
Email: lgodfrey@sumangodfrey.com  
                  kmarks@susmangodfrey.com  
                  jross@susmangodfrey.com  
                  jcarter@susmangodfrey.com  
                  dpeterson@susmangodfrey.com

Parker C. Folse III  
Rachel S. Black  
Jordan Connors  
SUSMAN GODFREY L.L.P.  
1201 Third Avenue, Suite 3800  
Seattle, Washington 98101-3000  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883  
Email: pfolse@susmangodfrey.com  
                  rblack@susmangodfrey.com  
                  jconnors@susmangodfrey.com

*Counsel for Plaintiff Alfred H. Siegel, as Trustee of the  
Circuit City Stores, Inc. Liquidating Trust*

/s/ Jason C. Murray

Jason C. Murray (CA Bar No. 169806)  
CROWELL & MORING LLP  
515 South Flower St., 40th Floor  
Los Angeles, CA 90071  
Telephone: 213-443-5582  
Facsimile: 213-622-2690  
Email: jmurray@crowell.com

Jerome A. Murphy (*pro hac vice*)  
Astor H.L. Heaven (*pro hac vice*)  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Telephone: 202-624-2500  
Facsimile: 202-628-5116

1 E-mail: [jmurphy@crowell.com](mailto:jmurphy@crowell.com)  
2 [aheaven@crowell.com](mailto:aheaven@crowell.com)

3 *Counsel for Plaintiff Target Corp.*

4 /s/ Craig A. Benson

5 Kenneth A. Gallo (*pro hac vice*)  
6 Joseph J. Simons (*pro hac vice*)  
7 Craig A. Benson (*pro hac vice*)  
8 PAUL, WEISS, RIFKIND, WHARTON &  
9 GARRISON LLP  
10 2001 K Street, NW  
11 Washington, DC 20006  
12 Telephone: (202) 223-7300  
13 Facsimile: (202) 223-7420  
14 [kgallo@paulweiss.com](mailto:kgallo@paulweiss.com)  
15 [jsimons@paulweiss.com](mailto:jsimons@paulweiss.com)  
16 [cbenson@paulweiss.com](mailto:cbenson@paulweiss.com)

17 Stephen E. Taylor (SBN 058452)  
18 Jonathan A. Patchen (SBN 237346)  
19 TAYLOR & COMPANY LAW OFFICES, LLP  
20 One Ferry Building, Suite 355  
21 San Francisco, California 94111  
22 Telephone: (415) 788-8200  
23 Facsimile: (415) 788-8208  
24 Email: [staylor@tcolaw.com](mailto:staylor@tcolaw.com)  
25 Email: [jpatchen@tcolaw.com](mailto:jpatchen@tcolaw.com)

26 *Counsel for Plaintiffs Sharp Electronics Corporation  
27 and Sharp Electronics Manufacturing Company of  
28 America, Inc.*